

CASSAundra Smith

V.

Bartholomew Consolidated

School Corporation,

Mount Healthy School, 1 : 20-cv-0267 JPH -DLP

Teresa Heiny

FILED

JAN 23 2020

U.S. CLERK'S OFFICE  
INDIANAPOLIS, INDIANA

COMPLAINT

Parties:

Plaintiff CASSAundra Smith is A resident of Indiana And resides At 3032 Beech Dr, Columbus, Ind 47203

Defendant Teresa Heiny, BCSC, And Mount Healthy School ARE Citizens of Indiana. Teresa Heiny is Employed By BCSC at 1200 Central Ave Columbus, Ind 47201

Mount Healthy School WAS in Joint Employment of Teresa Heiny At 12150 East State Road 58 Columbus, Ind 47201

## STATEMENT of claim

on or about October 10<sup>th</sup> 2019 in Columbus, Ind the Plaintiff WAS Employed By the Bartholomew County School Corporation To work AS An Employee at Mount Healthy School. the Plaintiff Had A father of one of her children living at her residence who WAS on House Arrest and WAS Violated for failing a urine screen, which His Drug use WAS Committed AT His place of Employment. When the plaintiff Attempted to return to work she was fired By Teresa Heiny who is Employed By BCSC To work at Mount Healthy School. MS. Heiny Claims BCSC ordered her to fire the plaintiff for Having Drug Activity At her residence. the plaintiff was Even given a Drug Test FROM DCS And PASSED. the plaintiff never at Any time had drug Activity At her residence And never was there Any Type of police reports with Claims of Drug Activity at her residence. Plaintiff Invokes the "class of one" Discrimination claim And Believes she was Arbitrarily Singled out for mistreatment And Also Discriminated against Because her child's father WAS African American And Being wrongfully Terminated for THAT reason. Plaintiff also claims

others in the same similar setting and situation was given different treatment than the plaintiff and not terminated from employment. Defendant Heiny was within the scope of her employment by BCSC and Mount Healthy when she wrongfully terminated the plaintiff and committed discrimination making all named defendants liable to the plaintiff for damages.

Plaintiff charges Bartholomew Consolidated School Corporation, Teresa Heiny, Mount Healthy School:

- Count 1: "Wrongful Termination"
- Count 2: "Class of One" Discrimination
- Count 3: Racial Discrimination
- Count 4: Violation of Equal Protection Law
- Count 5: Intentional Infliction of Emotional Distress

All claims causing emotional distress, loss of liberty, mental anguish, lost wages

Plaintiff is suing for violation of federal  
and state law

Plaintiff makes a Jury trial Demand

Prayer for relief

Plaintiff request the Amount of \$150,000.00  
from each Defendant for Damages

Plaintiff request \$10,000.00 in lost wages

So said and Submitted this 17<sup>th</sup> day of  
January 2020

*Cassandra Smith*

CASSANDRA SMITH  
3032 Beech Dr.  
Columbus, Ind 47203